

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
<b>Caption in Compliance with D.N.J.LBR 9004-1</b>	
<b>STEWART LEGAL GROUP, P.L.</b> <i>Formed in the State of Florida</i> Gavin N. Stewart, Esq. <i>Of Counsel to Bonial &amp; Associates, P.C.</i> 401 East Jackson Street, Suite 2340 Tampa, FL 33602 Tel: 813-371-1231/Fax: 813-371-1232 E-mail: gavin@stewartlegalgroup.com <i>Attorney for Nissan Motor Acceptance Corporation</i>	
In re:  Warren J Cooper Marcianne Cooper   Debtors.	Chapter: 13  Case No.: 19-30569-JNP  Hearing Date: November 17, 2020  Judge Jerrold N. Poslusny, Jr.

**NOTICE OF MOTION TO VACATE AUTOMATIC STAY**

TO: Warren J Cooper  
Marcianne Cooper  
510 Arndt Avenue  
Riverside, NJ 08075  
Debtors

Brad J. Sadek  
Sadek and Cooper  
1315 Walnut Street, Ste 502  
Philadelphia, PA 19107  
Attorney for Debtors

Isabel C. Balboa  
Chapter 13 Standing Trustee  
Cherry Tree Corporate Center  
535 Route 38 - Suite 580  
Cherry Hill, NJ 08002

**PLEASE TAKE NOTICE** that on November 17, 2020 at 11:00 AM or as soon thereafter as counsel can be heard, the undersigned attorney for Nissan Motor Acceptance Corporation

("Movant"), will move before United States Bankruptcy Court, Honorable Jerrold N. Poslusny, Jr., U.S.B.J., Courtroom Number 4C, 400 Cooper Street, 4th Floor, Camden, NJ 08101, for an Order Vacating the Automatic Stay with respect to the following property: 2015 Nissan Altima; VIN: 1N4AL3APXFC170274 .

**PLEASE TAKE FURTHER NOTICE** that the Motion is based on the default in the post-petition payments due to Movant. Movant asserts that the facts and law it relies upon in making this Motion are neither complicated nor unique, and therefore no brief or legal memorandum is necessary pursuant to D.N.J. LBR 9013-1. Movant shall rely on the Certification and Proposed Order attached hereto.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the relief requested shall be in writing, specify with particularity the basis for such objections, and be filed with the Clerk of Court and served on counsel for Movant, Stewart Legal Group, P.L., 401 East Jackson Street, Suite 2340, Tampa, FL 33602, so as to be received no later than seven (7) days before the return date, in accordance with D.N.J. LBR 9013-2(a). Unless objections are timely filed and served, the Motion may be deemed uncontested.

Dated: October 22, 2020

Stewart Legal Group, P.L.  
Attorney for Nissan Motor Acceptance Corporation

By: /s/Gavin N. Stewart  
Gavin N. Stewart